



Michael R. O'Donnell
Partner
Direct:
t: 973.451.8476
f: 973.451.8669
modonnell@riker.com
Reply to: Morristown

April 4, 2011

VIA ELECTRONIC FILING

Honorable Dickinson R. Debevoise
U.S. District Court, District of New Jersey
Martin Luther King Jr. Federal Building and
Courthouse, Room 5083
50 Walnut Street
Newark, New Jersey 07102

Re: Dare Investments, LLC v. Chicago Title Insurance Co., et al.,
Case No. 10-6088

Dear Judge Debevoise:

We represent Chicago Title Insurance Company ("Chicago Title") in the above matter. On February 9, 2011, Chicago Title filed a Motion to Seal excerpts of Interviews-Under-Oath (and exhibits therefrom) conducted of Richard McCloskey (the principal of Dare Investments, LLC ("Dare")) and E. Kenneth Williams (one of Dare's counsel) (the "Motion"). Prior to filing the Motion, Chicago Title contacted Dare's counsel to determine its position as to whether the above documents should be filed under seal. Dare failed to respond to Chicago Title's inquiries.

On March 4, 2011, Dare filed an opposition to the Motion citing the public's right to access documents filed with the Court. Based on Dare's opposition, Chicago Title withdraws the Motion. Chicago Title filed the Motion so as not to prejudice any protections, privileges or defenses assertable by Dare in the New Jersey State Court Action raising claims as to the Sayreville Mortgage. Accordingly, this withdrawal is done while reserving any and all rights arising from Dare's disclosure of these materials as they may impact Dare's title policy.

Headquarters Plaza, One Speedwell Avenue, Morristown, NJ 07962-1981 • t: 973.538.0800 f: 973.538.1984

50 West State Street, Suite 1010, Trenton, NJ 08608-1220 • t: 609.396.2121 f: 609.396.4578

500 Fifth Avenue, New York, NY 10110 • t: 212.302.6574 f: 212.302.6628

London Affiliate: 33 Cornhill, London EC3V 3ND, England • t: +44 (0) 20.7877.3270 f: +44 (0) 20.7877.3271

www.riker.com

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We thank you for Your Honor's consideration.

Respectfully,

Michael R. O'Donnell

cc: Peter Strojnik, Esq. (via ECF)
Christopher Humphrey, Esq. (via ECF)